

MEMORANDUM

TO: GENE FOWLER, CASE MANAGER, BNCM

FROM: TERRY MCADAMS, TECHNICAL COORDINATOR, BEERA

SITE: UNIMATIC MANUFACTURING CORPORATION
FAIRFIELD TOWNSHIP, ESSEX COUNTY
ISRA CASE #: E20010335Referral Types: Supplemental Remedial Investigation Reports (RIR)- Soils
and Indoor Concrete FlooringReferral Dates: 2/7/05
3/2/05
3/3/05
3/8/05
3/10/05Document Dates: 1/28/05
3/2/05
3/3/05
3/7/05
3/9/05PAC Codes: V3W2
Completion Date: 4/12/05

Job Code: A1988200

NOTE TO CASE MANAGER: As all the above submittals pertain either to some missing/incomplete documents requested in your 11/9/04 letter, or to one AOC in this case (PCB contamination in and under the interior concrete flooring), all the above submittals are addressed in this one memo.

All items that require further investigation and submittals by the RP, or actions of the Case Manager, are highlighted in bold below.

SUMMARY:

The Unimatic Manufacturing Corporation (Unimatic) property is a 1.23 acre former manufacturing facility located at Block 2303, Lot 8, 25 Sherwood Lane, Fairfield Township, NJ ("the site"). The company operated an aluminum die-casting manufacturing business at the site from 1955 to 2001, making extensive historic use of PCB-laden lubricants. The site has a well-documented history of PCB soil contamination, some of which has migrated off-site. Extensive soil excavation has already been performed at the site. Groundwater PCB contamination has also been documented at the site. A 4/3/03 DEP letter responding to RIR submittals on 6/7/02, 8/9/02 and 10/29/02, required submittal of another RIR addressing interior and exterior PCB delineation, off-site PCB migration, groundwater contamination, institutional and engineering controls,

historic fill sampling, septic system sampling, as well as sampling of soils under a leaking on-site drum. An 11/5/03 RIR, prepared on behalf of Unimatic by GZA GeoEnvironmental, Inc. (GZA), was submitted in response to the requirements detailed in the aforementioned DEP letter. BEERA transmitted comments on that RIR to the Case Manager on 2/2/04. Those comments were incorporated in an 11/9/04 letter from the Case Manager to Unimatic.

THIS SUPPLEMENTAL RIRs BELOW ARE EITHER UNACCEPTABLE OR CONDITIONALLY ACCEPTABLE, SUBJECT TO REVIEW OF THE SUBMITTAL ITEMS REQUIRED BELOW.

SUPPLEMENTAL RIRs

1/28/05 Unimatic Letter with Attachments

Letter from Aqua Pro-Tech Laboratories (Aqua-Pro) dated 12/2/04:

Aqua-Pro has agreed to include a complete table of contents in all future analytical data submittals.

Aqua-Pro's explanation for using micrograms per kilogram units to report soil sample analytical results is acceptable.

Aqua-Pro's submittal of the sample receipt logbook pages for the samples that lacked the required sample storage temperature on the corresponding chain of custody form is noted. It is also noted that the sample storage temperature recorded on these log sheets is 6 degrees C, one degree warmer than the 5 degrees C required by N.J.A.C. 7:18 (the regulation cited by Aqua-Pro). Nonetheless, these sample storage temperatures are acceptable and the analytical results for the eighteen samples collected during the 5/8/03 sampling event are acceptable as presented.

Aqua-Pro's explanation of the surrogate recovery methods is acceptable, Therefore the analytical results for the samples SB-54 (3 to 3.5-foot bgs), SB-80 (3 to 3.5-foot bgs), SB-81 (3 to 3.5-foot bgs) and SB-81 (8 to 8.5-foot bgs) collected during the 7/16/03 sampling event are acceptable as presented. Also, samples RI-PE-1, SPE-5, SPE-6, SPE-8, SPE-10, SPE-12 and SPE-13 are acceptable as presented.

Clean Fill Certifications form EISCO-NJ:

The delivery receipts and letter certifications submitted are acceptable as presented.

Soil Sampling Table:

Unimatic has included a complete soil sample table, including sample depths bgs, geographical coordinates, dates, analytes, total PCB concentrations, report name and whether or not boring logs were required. This sampling table is acceptable as presented.

Revised Boring Logs:

Unimatic has included 143 soil boring logs in this submittal. Unimatic indicates that the boring logs are revised, presumably to comply with the requirements of the 11/9/04 NJDEP letter. These logs are **conditionally acceptable**. Unimatic has not addressed all the deficiencies in the boring logs detailed in the 11/9/04 letter. These deficiencies include:

Unimatic has not identified what standard system of soil classification was employed in the sample descriptions (as required by the Technical Rules of Site Remediation (TRSR) at N.J.A.C. 7:26E-3.6(a)2ii;

Unimatic has not provided the required rationale for the no recovery intervals noted on several logs;

Unimatic has not yet clarified why "no samples collected" is indicated under Sample Description and why "NA" is shown under Stratum description;

Unimatic has not yet provided ground surface elevation or datum on any boring logs;

Unimatic shall again revise the soil boring logs submitted with this RIR to address the above deficiencies and include the information in the next submittal.

Ground Water Contour Map:

Submittal of this map for the 11/3-4/04 gauging event is noted. Comment on the map is deferred to the assigned BGWPA geologist.

Summary Analytical Table:

Submittal of this table for the 11/3-4/04 ground water sampling event is noted. Comment on the table is deferred to the assigned BGWPA geologist.

Boring Location Graphics:

Submittal of these informative graphics from the 1/20/05 meeting is noted and appreciated.

Sampling Location Plan:

The revised sampling location plan (site map) included in the submittal is acceptable and appreciated.

3/2/05 Unimatic Letter with Attachments

This letter includes a report of a 2/7/05 sampling event in which chip and wipe samples were collected from the interior building concrete flooring in the southeastern portion of the building. As extensive surficial PCB contamination was reported in nearly all the chip and wipe samples, additional chip and wipe sampling was proposed to

delineate this contamination. Two core samples of the concrete flooring were also proposed to attempt vertical delineation of the PCB contamination at this AOC.

BEERA Comments: Proposal is **conditionally acceptable**.

The additional core sampling proposed in this RIR is acceptable as a step toward delineation of the PCB contamination in and under the building. It is BEERA's position that the core sampling is necessary to determine if PCBs in the soils underlying the building floor are the source of the flooring contamination, or if the flooring contamination is causing soils contamination.

It appears from a reading of subsequent Unimatic letters (see below) that this proposal had since been revised, due to a subsequent OSHA inspection at the site. BEERA comments on the revised proposal are included below.

3/3/05 Unimatic Letter with Attachments

This letter contains a proposal to seal off the area of the building containing the contaminated flooring and manually clean the PCB-contaminated surface of the flooring with a trisodium phosphate cleaner. After wet vacuuming and drying, it is proposed to seal the flooring with a color-dyed epoxy sealer, followed by a top coat of epoxy paint of a different color than the sealer coat.

BEERA Comments: No comment at this time.

As this proposal for cleaning and sealing the PCB contaminated concrete flooring in the building was made prior to completing the vertical delineation of the PCB contamination in and under the building flooring, BEERA has no comment at this time. If a completed delineation of the PCB contamination indicates that the PCBs in the building flooring are not impacting, or are not impacted by, the underlying soils, the chip and wipe sampling of the building flooring would be under the jurisdiction of OSHA.

3/7/05 Unimatic Letter

This letter was submitted after the Case manager and two representatives from OSHA inspected the interior of the building. Unimatic reports that the OSHA inspectors required immediate action such as surface cleaning to protect the facility workers. Unimatic reports that the proposed TSP surface cleaning was ineffective, and that a concrete planer was used to remove the top 1/4 inch of concrete and oil residue covering the surface in the southeastern portion of the building. Analytical results of the chip and wipe samples collected after the floor planing were not submitted with the letter. GZA proposed revising the chip and wipe sample delineation plan and including it in a future submittal.

BEERA Comments: Proposal **unacceptable**.

As core sampling of the building flooring was apparently not completed, and the revised delineation plan for the building as well as the sampling results were not included with this letter, the proposal cannot be accepted at this time.

3/9/05 Unimatic Letter with Attachments

This letter includes a summary statement of the results of the 3/7/05 chip and wipe sampling in the building: "most of the chip and wipe samples collected on March 7, 2005

contained PCBs at concentrations above applicable standards, some significantly above these standards." Actual analytical results are promised in a future supplemental RIR. Unimatic also reports that the OSHA inspectors expressed a concern that the PCB contamination might have spread to other parts of the building via foot traffic, forklifts, etc. Unimatic included a revised chip and wipe sampling proposal to address the OSHA concerns.

BEERA Comments: Proposal is **conditionally unacceptable**.

This sampling plan for the building is conditionally acceptable, pending submittal of the sampling results for the 3/7/05 chip and wipe sampling. Also, Unimatic omits any mention of the two core samples proposed in the 3/2/05 letter (above). The location of these core samples is noted on the included plan. Unimatic shall ensure that the two core samples are completed concurrently with the proposed chip and wipe samples and that all sampling analytical results are included in the next submittal.

While the Department appreciates the urgency of completing the remediation of this PCB contamination, until such time as these results and data deliverables are submitted and vertical and horizontal delineation of the PCB contamination in and under the building is completed to the appropriate cleanup criteria, any and all remedial actions in the building cannot be approved by NJDEP.

ADDITIONAL COMMENTS

A review of the 3/9/05 NJDEP letter to William J. Friedman, counsel for Unimatic, indicates that the Department will continue to apply the TRSR and the most stringent SCC at the Unimatic site, regardless of the US Environmental Protection Agency's (USEPA) position on PCB site-specific cleanup standards. This position does not reflect BEERA's understanding of what transpired at the 2/18/05 meeting discussed in the letter. Rather, BEERA's understanding is that, if Unimatic wishes to apply a less stringent cleanup standard of 100 ppm for soils at the site, they may do so if USEPA agrees and if Unimatic can demonstrate no impacts to groundwater resulting from the less stringent standard.

Further BEERA Comments: Additional comments can be offered after the submittals required above are made by the RP.

cc: B. Hanrahan, BGWPA
#s: 6380, 6416, 6433, 6447, 6459